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19
20 **UNITED STATES BANKRUPTCY COURT**
21 **NORTHERN DISTRICT OF CALIFORNIA**
22 **SAN FRANCISCO DIVISION**

23 In re) Case No. 19-30088 (DM)
24 PG&E CORPORATION,)
25 and) Chapter 11
26 PACIFIC GAS AND ELECTRIC) (Lead Case–Jointly Administered)
27 COMPANY)
28 Debtors)

29 Affects:) MOTION TO ALLOW/DEEM TIMELY
30 PG&E Corporation) LATE FILING OF PROOF OF CLAIM
31 Pacific Gas & Electric Company) BY L.D.P. (MINOR) AND S.D.P.
32 Both Debtors) (MINOR); MEMORANDUM OF
33) POINTS AND AUTHORITIES;
34) DECLARATION OF ERIKA L.
35) VASQUEZ IN SUPPORT
36) Date: June 24, 2020
37) Time: 10:00 a.m. (Pacific)
38) Place: **Telephonic Appearances Only**
39) United States Bankruptcy
40 Case,) Courtroom 17, 16th Floor
41 No. 19-30088 (DM).) San Francisco, CA 94102
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44) Objection Deadline: June 10, 2020
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1 TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT
2 JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
3 PARTIES:

4 The Singleton Law Firm (“SLF”) and Marshack Hays LLP, together with several other firms,
5 represent thousands of victims (“SLF Claimants”) of the fires started by PG&E in 2015 (“Butte
6 Fire”), 2017 (the twenty fires generally referred to as the “North Bay” and “Wind Complex Fires”),
7 2018 (“Camp Fire”) and 2019 (“Kincade Fire” and “LaFayette Fire”).

8 SLF respectfully file this motion on behalf of L.D.P. (“Minor 1”) and S.D.P. (“Minor 2”)
9 (collectively Minor 1 and Minor 2 are referred to as “Movants”) to deem timely late filed proofs of
10 claim (“Motion”).

11 **I. Summary of Argument**

12 A proof of claim may be deemed timely upon a showing of excusable neglect and lack of
13 prejudice. In this case, due to a variety of stressors arising from the 2018 Camp Fire, and internal
14 administrative error, proofs of claims of behalf of Movants’ were not timely filed. Because there is no
15 danger of prejudice to the Debtors as Debtors’ estates are solvent, and all creditors stand to be paid,
16 the Motion should be granted to allow these minors to have their claims deemed timely. This Court
17 must determine whether to grant the Motion.

18 **II. Factual Background**

19 **A. Movants’ Claims Arising From Camp Fire¹**

20 Creditors Jesse Dean Pacheco Scott (“Mr. Pacheco”) and Tiffany Anderson (“Ms. Anderson”)
21 (collectively, Mr. Pacheco and Ms. Anderson are referred to herein as “Parents”) and their children ,
22 L.D.P. and S.D.P. (“Children”) are survivors of the Camp Fire that occurred in 2018². While Parents
23

24 ¹ See, Declaration of Erika L. Vasquez, ¶8.

25 ² When the Camp Fire struck, Ms. Anderson was at home caring for children L.D.P. and S.D.P., while Mr. Pacheco was
26 at work 2 hours away. Ms. Anderson was also 38 weeks pregnant with their third child, M.P. When Ms. Anderson saw
smoke and the sky begin to glow, she evacuated with L.D.P. (6 at the time), and S.D.P. (1 at the time) along with their
27 pets. It took them **hours** to evacuate the area to safety, while the Children saw flames erupt and explosions of propane
tanks. That night Ms. Anderson went into preterm labor, but could not reach her doctor because he similarly was
evacuating. Fortunately, she reached a hospital and ultimately gave birth a little less than a month later to M.P.

1 executed a retainer agreement on their behalves and provided SLF with information necessary to
2 timely file their proofs of claim, Parents did not execute a retainer agreement on behalf of their minor
3 children, L.D.P. and S.D.P. (“Children”). Although Children were emotionally impacted by the Camp
4 Fire, due to age, trauma, oversight and the immense pressure Parents were under to safely relocate
5 their lives, SLF did not timely receive details necessary to complete Childrens’ claims. Accordingly,
6 no proofs of claim were filed on behalf of Children.

7 **B. Movants’ Notify SLF of Claim Due To SLF Audit Procedures³**

8 The Singleton Law Firm (“SLF”) sends frequent update letters to all SLF Claimants. In the
9 general communication letters sent throughout 2019, SLF stressed to clients the importance of
10 confirming their name, date of birth and burn address (impacted address) and notifying SLF of any
11 other persons for Proof of Claim filing purposes, which would then need subsequent confirmation.

12 Additionally, SLF conducted an audit (“Audit Process”) of all SLF Fire Victim Claimants,
13 asking them to confirm their name, date of birth, and burn address in writing. Specifically, the Audit
14 Process included the following:

- 15 1. Email all SLF Claimants (“Client(s)”) from pgeclaims@slffirm.com stating that SLF
needed them to confirm their full legal name, date of birth, and burn address for all
16 parties on their case and to also let us know of any other persons and/or entities that
should be included for Proof of Claim purposes.
- 17 2. Upon receiving a Client email SLF replied to that email address the information
contained in the email was reviewed and compared to that which SLF had in the
18 client’s file.
- 19 3. If there were discrepancies, then the SLF’s handling staff made notes in the “BK audit
notes” field in the Client’s file and then followed up with the client via email to
reconcile.
- 20 4. Once the discrepancies were resolved and all the case parties (individuals and entities)
confirmed, then those additional parties were added into the Client file as a recognized
21 case party.
- 22 5. Alternatively, if the information in the client email response matched, the BK audit on
that Client file was deemed complete and no further handling was needed.
- 23 6. All Client emails were saved and contact logs were made in the client file.
7. If a new case party was added, a retainer was sent for their signature.

24 Unfortunately, despite the internal audit protocols, the Children were not discovered until
25 after the claims bar date. Specifically, in July of 2019, SLF received a retainer agreement executed by
26

27
28 ³ See, Declaration of Erika L. Vasquez, ¶¶9-13.

1 Parents. While the Childrens' names were written in the notes section of retainer agreement,
2 unfortunately, Parents did not sign the agreement on behalf of the Children. In December 2019, an
3 intake call was conducted with the Parents. On the intake form, SLF noted Parents had minor
4 children. Despite SLF protocol, due to the lack of an executed retainer on behalf of the children and
5 inadvertence, the Children were not marked as case parties in SLF's internal system.

6 In May 2020, Mr. Pacheco placed a call to SLF (a) indicating the Children "were not on the
7 complaint" and (b) asked SLF if his minor children could be "added" to the claim.

8 On May 22, 2020, SLF filed claim numbers AAFW\$27402 and MN!FM27402 on behalf of
9 Movants ("Subject Proofs of Claims"). True and correct copies of the Subject Proofs of Claim are
10 collectively attached to the Vasquez Declaration as Exhibit "1."

11 Thus, SLF now brings this Motion to have the Subject Proofs of Claim deemed timely.

12 **C. General Procedural Background**

13 On January 29, 2019, PG&E Corporation and Pacific Gas and Electric Company ("Debtors")
14 or ("PG&E") commenced with the Court voluntary cases ("Chapter 11 Cases") under chapter 11 of the
15 United States Code ("Bankruptcy Code"). PG&E's chapter 11 filings were necessitated by a
16 confluence of factors resulting from catastrophic fires that occurred in Northern California prior to
17 the Petition Date, and PG&E's potential liabilities arising therefrom.

18 Since, the Debtors continue to operate their businesses and manage their properties as
19 debtors in possession pursuant to 11 U.S.C. §§ 1107(a) & 1108, the Debtors' Chapter 11 Cases are
20 being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Federal
21 Rules of Bankruptcy Procedure ("FRBP").

22 **D. Plan, Disclosure Statement, and the Solicitation Procedures Motion**

23 On January 31, 2020, as Dk. No. 5590, the Debtors filed an Amended Chapter 11 Plan
24 Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated January 31,
25 2020

26 On February 7, 2020, as Dk. No. 5700, the Debtors filed a Disclosure Statement for the
27 Amended Plan.

28 ////

1 On February 19, 2020, as Dk. No. 5835, the Debtors filed Motion for Entry of an Order (I)
2 Approving Form and Manner of Notice of Hearing on Proposed Disclosure Statement; (II)
3 Establishing and Approving Plan Solicitation and Voting Procedures; (III) Approving Forms of
4 Ballots, Solicitation Packages, and Related Notices; and (IV) Granting Related Relief (“Solicitation
5 Procedures Motion”).

6 On March 16, 2020, as Dk. No. 6320, the Debtors filed the Amended Chapter 11 Plan
7 Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March 16,
8 2020. On March 17, 2020, the Solicitations Procedures Motion was approved. Since then, the
9 Disclosure Statement and Plan were circulated for votes with voting completed on May 15, 2020.

10 **E. Extended Bar Date for Fire Victim Creditors**

11 The deadline for filing proofs of claim with respect to any prepetition claim including, but not
12 limited to, all claims of Fire Claimants, Wildfire Subrogation Claimants, Governmental Units and
13 Customers, and for the avoidance of doubt, including all secured claims and priority claims, against
14 either of the Debtors was October 21, 2019 at 5:00 p.m. (“General Bar Date”).

15 The deadline for filing claims was extended to December 31, 2019 (“Extended Bar Date”),
16 solely for the benefit of any non-governmental Fire Claimants who did not filed Proofs of Claim by
17 the General Bar Date.

18 **III. Legal Argument**

19 In a Chapter 11 case, the time to file a proof of claim may be extended under certain
20 circumstances. Fed. R. Bank. Pro. 3003(c)(3); Fed. R. Bank. Pro. 9006(b)(1). The bankruptcy court
21 has “broad equitable powers” in a Chapter 11 case with respect to the timing requirement for proofs
22 of claim. *Pioneer Inventory Services v. Brunswick Associates Limited Partnership*, 507 U.S. 380, 389
23 (1993). All in all, Rule 9006(b)(1) allows “late filings caused by inadvertence, mistake, or
24 carelessness, not just those caused by intervening circumstances beyond the party's control.” *Id.*, at
25 381. Even a creditor that did in fact receive notice may file a proof of claim notwithstanding the
26 expiration of a claims bar date in a Chapter 11 case upon a showing of “excusable neglect.” *Id.* at
27 394-95 (“Had respondents here been prevented from complying with the bar date by an act of God or
28 some other circumstance beyond their control, the Bankruptcy Court plainly would have been

1 permitted to find ‘excusable neglect’ [under FRBP 9006].”).

2 In considering whether a creditor’s failure was the product of “excusable neglect,” the court
3 should take “account of all relevant circumstances surrounding the party’s omission,” including “the
4 danger of prejudice to the debtor, the length of the delay and its potential impact on judicial
5 proceedings, the reason for the delay, including whether it was within the reasonable control of the
6 movant, and whether the movant acted in good faith.” *Id.* at 395; *see also Corning v. Corning (In re*
7 *Zilog, Inc.*), 450 F.3d 996 (9th Cir. 2006) (noting Pioneer’s non-exhaustive list of relevant factors).
8 Again, a late-filed proof of claim is allowable where a creditor had actual notice of the bankruptcy
9 but, due to some external reason, failed to file a proof of claim or did not realize that she had to,
10 before the bar date. *See, e.g., ZiLOG, Inc. v. Corning (In re ZiLOG, Inc.)*, 450 F.3d 996, 1003-07 (9th
11 Cir. 2006) (applying the *Pioneer* factors). All in all, Rule 9006(b)(1) allows “late filings caused by
12 inadvertence, mistake, or carelessness, not just those caused by intervening circumstances beyond the
13 party’s control.” *Pioneer*, 507 U.S. at 381. Here, consideration of all the *Pioneer* factors weigh in
14 favor of Movants.

15 Because in this case there is no danger of prejudice to the Debtors, the first *Pioneer* factor
16 weighs overwhelmingly in Movant’s favor. Debtors’ estates are solvent, and all creditors stand to be
17 paid. *See, e.g., In re Best Payphones, Inc.*, 523 B.R. 54, 75-6 (Bankr. S.D.N.Y. 2015) and *In re*
18 *Sheehan Mem’l Hosp.*, 507 B.R. 802, 803 (Bankr. W.D.N.Y. 2014) (where the chapter 11 estate is
19 solvent, “the proper remedy for a late filing is not the expungement of a claim, but its allowance as a
20 tardily filed claim only.). Secondly, immediately, upon receiving all the necessary information the
21 Subject Proofs of Claims were filed. Thirdly, the delay in filing the Subject Proofs of Claim is
22 reasonable considering the age of Movants and the stress of relocating after the emotional trauma
23 they experienced as survivors of the Camp Fire. Lastly, any prospect of prejudice beyond solvency is
24 unlikely given (a) distributions have not been made; and (b) the value of Movants’ claims relative to
25 the value of Debtors’ estates is low. *See, e.g., In re Keene Corp.*, 188 B.R. 903, 910 (Bankr. S.D.N.Y.
26 1995) (size of the late claim in relation to the estate is a consideration in determining prejudice).

27 ///

28 ///

IV. Conclusion

For the reasons set forth above, the Movants respectfully request that this Court enter an order pursuant to Bankruptcy Rule 9006(b)(1) as follows:

1. Granting the Motion;
2. Deeming the Subject Proofs of Claim filed by Movants timely;
3. Granting such other or further relief as the Court deems just and proper.

Dated: May 22, 2020

MARSHACK HAYS LLP

/s/ Laila Masud

By:

RICHARD A. MARSHACK
LAILA MASUD
Attorneys for SLF CLAIMANTS

Dated: May 22, 2020

SINGLETON LAW FIRM, APC

By: /s/ Gerald Singleton

By: **GERALD SINGLETON**
JOHN LEMON
Attorneys for the **SINGLETON LAW**
FIRM FIRE VICTIM CLAIMANTS

Declaration of Erika L. Vasquez

I, ERIKA L. VASQUEZ, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set

forth in this Declaration.

3. The facts set forth below are true of my personal knowledge.

4. I am an attorney at law duly admitted to practice before this Court and all courts of
te of California.

5. I am an attorney with the law firm of Singleton Law Firm, APC, attorneys of record for thousands of victims (“SLF Claimants”) of the fires started by PG&E in 2015 (“Butte Fire”), 2017 (the twenty fires generally referred to as the “North Bay” and “Wind Complex Fires”), 2018 (“Camp Fire”) and 2019 (“Kincade Fire” and “LaFayette Fire”).

6. I reviewed the docket in this case prior to execution of this Declaration to refresh my memory as to the dates on which particular documents were filed.

7. I make this Declaration in support of the motion to allow late filing of proofs of claim (“Motion”) on behalf of L.D.P. (“Minor 1”) and S.D.P. (“Minor 2”) (collectively Minor 1 and Minor 2 are referred to as (“Movants” or “Children”)).

8. Creditors Jesse Dean Pacheco Scott (“Mr. Pacheco”) and Tiffany Anderson (“Ms. Anderson”) (collectively, Mr. Pacheco and Ms. Anderson are referred to herein as “Parents”) and their children , L.D.P. and S.D.P. (“Children”) are survivors of the Camp Fire that occurred in 2018⁴. While Parents executed a retainer agreement on their behalves and provided SLF with information necessary to timely file their proofs of claim, Parents did not execute a retainer

⁴ When the Camp Fire struck, Ms. Anderson was at home caring for children L.D.P. and S.D.P., while Mr. Pacheco was at work 2 hours away. Ms. Anderson was also 38 weeks pregnant with their third child, M.P. When Ms. Anderson saw smoke and the sky begin to glow, she evacuated with L.D.P. (6 at the time), and S.D.P. (1 at the time) along with their pets. It took them **hours** to evacuate the area to safety, while the Children saw flames erupt and explosions of propane tanks. That night Ms. Anderson went into preterm labor, but could not reach her doctor because he similarly was evacuating. Fortunately, she reached a hospital and ultimately gave birth a little less than a month later to M.P.

1 agreement on behalf of their minor children, L.D.P. and S.D.P. (“Children”). Although Children
2 were emotionally impacted by the Camp Fire, due to age, trauma, oversight and the immense
3 pressure Parents were under to safely relocate their lives, SLF did not timely receive details
4 necessary to complete Childrens’ claims. Accordingly, no proofs of claim were filed on behalf of
5 Children.

6 9. The Singleton Law Firm (“SLF”) sends frequent update letters to all SLF
7 Claimants. In the general communication letters sent throughout 2019, SLF stressed to clients the
8 importance of confirming their name, date of birth and burn address (impacted address) and
9 notifying SLF of any other persons for Proof of Claim filing purposes, which would then need
10 subsequent confirmation. Additionally, SLF conducted an audit (“Audit Process”) of all SLF Fire
11 Victim Claimants, asking them to confirm their name, date of birth, and burn address in writing.
12 Specifically, the Audit Process included the following:

- 13 a) Email all SLF Claimants (“Client(s)”) from pgeclaims@slffirm.com stating that SLF
14 needed them to confirm their full legal name, date of birth, and burn address for all parties
on their case and to also let us know of any other persons and/or entities that should be
included for Proof of Claim purposes.
- 15 b) Upon receiving a Client email SLF replied to that email address the information contained
in the email was reviewed and compared to that which SLF had in the client’s file.
- 16 c) If there were discrepancies, then the SLF’s handling staff made notes in the “BK audit
notes” field in the Client’s file and then followed up with the client via email to reconcile.
- 17 d) Once the discrepancies were resolved and all the case parties (individuals and entities)
confirmed, then those additional parties were added into the Client file as a recognized
case party.
- 18 e) Alternatively, if the information in the client email response matched, the BK audit on that
Client file was deemed complete and no further handling was needed.
- 19 f) All Client emails were saved and contact logs were made in the client file.
- 20 g) If a new case party was added, a retainer was sent for their signature.

21 10. Unfortuntaely, despite the internal audit protocols, the omission of Children was
22 not caught until after the claims bar date. Specifically, in July of 2019, SLF received a retainer
23 agreement executed by Parents. While the Childrens’ names were written in the notes section of
24 retainer agreement, unfortuantely, Parents did not sign the agreement on behalf of the Children. In
25 December 2019, an intake call was conducted with the Parents. On the intake form, SLF noted
26 Parents had minor children.

27 11. In May 2020, Mr. Pacheco placed a call to SLF (a) indicating the Children “were
28 not on the complaint” and (b) asking if SLF if his minor children could be “added” to the claim.

12. On May 22, 2020, SLF filed claim numbers AAFW\$27402 and MN!FM27402 on behalf of Movants (“Subject Proofs of Claims”). True and correct copies of the Subject Proofs of Claim are collectively attached as Exhibit “1.”

13. Despite SLF protocol, due to the lack of an executed retainer on behalf of the children and inadvertence, the Children were not marked as case parties in SLF's internal system. Thus, SLF now brings this Motion to have the Subject Proofs of Claim deemed timely.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 22, 2020

~~ERIK A. VASQUEZ~~

EXHIBIT 1

Case: 19-30088 Doc# 7534 Filed: 05/22/20 Entered: 05/22/20 17:15:23 Page 11
of 25

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	L.P. (a minor, parent Jesse Pacheco Scott) Name of the current creditor (the person or entity to be paid for this claim)		
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____		
3. Are you filing this claim on behalf of your family?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____	Name _____ Attorney Name (if applicable) _____ Attorney Bar Number (if applicable) _____ Street Address _____ City _____ State _____ Zip Code _____ Phone Number _____ Email Address _____	
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____/_____/_____		
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____		

Part 2: Give Information About the Claim as of the Date this Claim Form is Filed

7. What fire is the basis of your claim? Check all that apply.	<input checked="" type="checkbox"/> Camp Fire (2018) <input type="checkbox"/> North Bay Fires (2017) <input type="checkbox"/> Ghost Ship Fire (2016) <input type="checkbox"/> Butte Fire (2015) <input type="checkbox"/> Other (please provide date and brief description of fire: _____)
8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.?)	Location(s): 13956 Andover Dr, Magalia, CA 95954-8821
9. How were you and/or your family harmed? Check all that apply	<input type="checkbox"/> Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage) <input type="checkbox"/> Owner <input type="checkbox"/> Renter <input checked="" type="checkbox"/> Occupant <input type="checkbox"/> Other (Please specify): <u>(minor)</u> <input checked="" type="checkbox"/> Personal Injury <input type="checkbox"/> Wrongful Death (if checked, please provide the name of the deceased) _____ <input type="checkbox"/> Business Loss/Interruption <input type="checkbox"/> Lost wages and earning capacity <input checked="" type="checkbox"/> Loss of community and essential services <input type="checkbox"/> Agricultural loss <input checked="" type="checkbox"/> Other (Please specify): <u>Any and all losses recoverable under CA law</u>
10. What damages are you and/or your family claiming/seeking? Check all that apply	<input checked="" type="checkbox"/> Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage) <input checked="" type="checkbox"/> Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage) <input checked="" type="checkbox"/> Punitive, exemplary, and statutory damages <input checked="" type="checkbox"/> Attorney's fees and litigation costs <input checked="" type="checkbox"/> Interest <input checked="" type="checkbox"/> Any and all other damages recoverable under California law <input type="checkbox"/> Other (Please specify): _____
11. How much is the claim?	<input type="checkbox"/> \$ _____ (optional) <input checked="" type="checkbox"/> Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it.
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.
 I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: Gerald Singleton

Gerald Singleton (05/22/2020 09:24 PDT)

Email: BKVoting@slffirm.com

Signature

Print the name of the person who is completing and signing this claim:

Name	Gerald Singleton		
	First name	Middle name	Last name
Title	Attorney		
Company	Singleton Law Firm		
<small>Identify the corporate servicer as the company if the authorized agent is a servicer.</small>			
Address	450 A Street, Fifth Floor		
	Number	Street	
	San Diego		CA
	City	State	ZIP Code
Contact phone	7606971330		SLFBKCorres@slffirm.com

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

I have supporting documentation.
(attach below) I do not have supporting documentation.

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date this claim form is filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- For a minor child, fill in only the child's initials and the full name of the child's parent or guardian. For example, write *A.B.*, a minor child (*John Doe, parent*). See Bankruptcy Rule 9037.
- You may but are not required to attach supporting documents to this form. Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of *redaction* of information below.
- Do not attach original documents because attachments may be destroyed after scanning.
- Question 3. Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- Question 9. If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://restructuring.primeclerk.com/pge>.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center
350 Salem Street
Chico, CA 95928

Marysville Service Center
231 "D" Street
Marysville, CA 95901

Napa Service Center
1850 Soscol Ave. Ste 105
Napa, CA 94559

Oroville Service Center
1567 Huntoon Street
Oroville, CA 95965

Redding Service Center
3600 Meadow View Road
Redding, CA 96002

Santa Rosa Service Center
111 Stony Circle
Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

Electronic Proof of Claim_AAFW\$27402

Final Audit Report

2020-05-22

Created:	2020-05-22
By:	Prime Clerk E-Filing (efiling@primeclerk.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAF4g2LnZHK4hEtqlvR8kQ1JZ3hSZFUcCN

"Electronic Proof of Claim_AAFW\$27402" History

- ③ Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com)
2020-05-22 - 4:22:52 PM GMT
- ④ Web Form filled in by Gerald Singleton (BKVoting@slffirm.com)
2020-05-22 - 4:24:44 PM GMT- IP address: 72.192.138.39
- ⑤ (User email address provided through API User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64)
AppleWebKit/537.36 (KHTML, like Gecko) Chrome/81.0.4044.138 Safari/537.36)
2020-05-22 - 4:24:46 PM GMT- IP address: 72.192.138.39
- ⑥ Signed document emailed to Gerald Singleton (BKVoting@slffirm.com) and Prime Clerk E-Filing
(efiling@primeclerk.com)
2020-05-22 - 4:24:46 PM GMT

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO DIVISION)

In re:
PG&E CORPORATION,
- and -
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

Proof of Claim (Fire Claim Related)

Read the instructions before filing this claim form. This form is for tort claimants who have a claim against the Debtors (i.e. PG&E Corporation and Pacific Gas and Electric Company) that arose prior to the Debtors filing for bankruptcy (i.e. prior to January 29, 2019) and that arose from, or relates to, a fire.

Do not use this form for non-fire claims. Non-fire tort claimants should use Form 410.

Do NOT file a fraudulent claim. A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Please type or print in the spaces below. Do NOT use red ink or pencil.

Part 1: Identify the Claim

1. Who is the current creditor?	S.P. (minor, parent Jesse Pachco Scott) Name of the current creditor (the person or entity to be paid for this claim)		
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____		
3. Are you filing this claim on behalf of your family?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes	If you checked "Yes", please provide the full name of each family member that you are filing on behalf of: _____ _____ _____ _____	
4. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)	
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Name <u>S.P. (minor, parent Jesse Pachco Scott)</u> Attorney Name (if applicable) <u>Gerald Singleton</u> Attorney Bar Number (if applicable) <u>208783</u> Street Address <u>450 A Street, Fifth Floor</u> City <u>San Diego</u> State <u>California</u> Zip Code <u>92101</u> Phone Number <u>7606971330</u> Email Address <u>SLFBKCorres@slffirm.com</u>		
5. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____		Filed on _____ MM / DD / YYYY
6. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____		

Part 2: Give Information About the Claim as of the Date this Claim Form is Filed

7. What fire is the basis of your claim?

Camp Fire (2018)
 North Bay Fires (2017)
 Ghost Ship Fire (2016)
 Butte Fire (2015)
 Other (please provide date and brief description of fire: _____)

Check all that apply.

8. What are the loss location(s) where you and/or your family suffered harm? (e.g. home or business address, place of injury, place from which you were evacuated, if different.?)

Location(s): 13956 Andover Dr, Magalia, CA 95954-8821

9. How were you and/or your family harmed?

Property Damage (homes, structures, personal property, land, trees, landscaping, and all other property damage)
 Owner Renter Occupant Other (Please specify): (minor)

Check all that apply

Personal Injury
 Wrongful Death (if checked, please provide the name of the deceased) _____
 Business Loss/Interruption
 Lost wages and earning capacity
 Loss of community and essential services
 Agricultural loss
 Other (Please specify): Any and all losses recoverable under CA law

10. What damages are you and/or your family claiming/seeking?

Economic damages (including replacement cost of damaged property, diminution in value, loss of use, lost inventory, lost profits, and other economic damage)

Non-economic damages (including loss of society and support, loss of consortium, pain and suffering, emotional distress, annoyance and discomfort, and other non-economic damage)

Check all that apply

Punitive, exemplary, and statutory damages
 Attorney's fees and litigation costs
 Interest
 Any and all other damages recoverable under California law
 Other (Please specify): _____

11. How much is the claim?

\$ _____ (optional)
 Unknown / To be determined at a later date

Part 3: Sign Below

The person completing this proof of claim must sign and date it.
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.
 I am the creditor's attorney or authorized agent.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Signature: Gerald Singleton
2020-05-22 17:15:23 (EDT)

Email: erika@slffirm.com

Signature

Print the name of the person who is completing and signing this claim:

Name	Gerald Singleton		
	First name	Middle name	Last name
Title	Attorney		
Company	Singleton Law Firm		
Identify the corporate servicer as the company if the authorized agent is a servicer.			
Address	450 A Street, Fifth Floor		
	Number	Street	
	San Diego		CA 92101
City	State	ZIP Code	
Contact phone	7606971330		SLFBKCorres@slffirm.com

Attach Supporting Documentation (limited to a single PDF attachment that is less than 5 megabytes in size and under 100 pages):

I have supporting documentation.
 I do not have supporting documentation.
(attach below)

PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTS AND REDACT ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND ATTACHMENTS ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE TO VIEW ONLINE.

IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION When you submit a proof of claim and any supporting documentation you must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. The responsibility for redacting personal data identifiers (as defined in Federal Rule of Bankruptcy Procedure 9037) rests solely with the party submitting the documentation and their counsel. Prime Clerk and the Clerk of the Court will not review any document for redaction or compliance with this Rule and you hereby release and agree to hold harmless Prime Clerk and the Clerk of the Court from the disclosure of any personal data identifiers included in your submission. In the event Prime Clerk or the Clerk of the Court discover that personal identifier data or information concerning a minor individual has been included in a pleading, Prime Clerk and the Clerk of the Court are authorized, in their sole discretion, to redact all such information from the text of the filing and make an entry indicating the correction.

Instructions for Proof of Claim (Fire Claim Related)

United States Bankruptcy Court

You may have a claim against the Debtors for monetary loss, personal injury (including death), or other asserted damages arising out of or related to a fire. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the chapter 11 process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both.
18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- Fill in all of the information about the claim as of the date this claim form is filed.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- For a minor child, fill in only the child's initials and the full name of the child's parent or guardian. For example, write *A.B., a minor child (John Doe, parent)*. See Bankruptcy Rule 9037.
- You may but are not required to attach supporting documents to this form.
Supporting documents will be gathered, maintained, and provided at a later date as instructed by the Court. If you do attach documents, you should attach redacted documents as supporting documentation will be made publicly available and will not be kept confidential. See the definition of *redaction* of information below.
- Do not attach original documents because attachments may be destroyed after scanning.
- Question 3. Members of a family may but are not required to file a proof of claim as a family but may, if they choose, submit individual claim forms for each family member that has a claim against the debtors.

- Question 9. If you suffered property damage, then provide the street address of each real property parcel where you suffered property damage. If you were personally evacuated as the result of a fire, then provide the address or intersection closest to where you encountered the fire and began evacuation. If you suffered property damage and were evacuated from a different location, include both. If you were a renter, provide the address of your residence.
- Question 10. This question requests general statements of underlying facts relating to harm and is not intended to be exhaustive or preclusive.
- Question 11. You are not required to include a claim amount with your proof of claim. Providing a claim amount at this time is optional.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form together with the original. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://restructuring.primeclerk.com/pge>.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. In this instance, PG&E Corporation and Pacific Gas & Electric Company.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Proof of claim: A form that shows the creditor has a claim against the debtors on or before the date of the bankruptcy filing (in these cases, January 29, 2019). The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

If by overnight courier or hand delivery:

PG&E Corporation Claims Processing Center
c/o Prime Clerk LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

You may also hand deliver your completed Proof(s) of Claim to any of the following service center offices (beginning July 15, 2019 through the Bar Date (October 21, 2019) during the hours of 8:30 a.m. – 5:00 p.m. Prevailing Pacific Time):

Chico Service Center
350 Salem Street
Chico, CA 95928

Marysville Service Center
231 "D" Street
Marysville, CA 95901

Napa Service Center
1850 Soscol Ave. Ste 105
Napa, CA 94559

Oroville Service Center
1567 Huntoon Street
Oroville, CA 95965

Redding Service Center
3600 Meadow View Road
Redding, CA 96002

Santa Rosa Service Center
111 Stony Circle
Santa Rosa, CA 95401

Photocopy machines will not be available at the Claim Service Centers; you must bring a photocopy of your Proof of Claim if you wish to receive a date-stamped copy.

Do not file these instructions with your form

Electronic Proof of Claim_MN!FM27402

Final Audit Report

2020-05-22

Created:	2020-05-22
By:	Prime Clerk E-Filing (efiling@primeclerk.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAArGTE-6HKZ3P_RFIVydkS5t6hRplb8Rug

"Electronic Proof of Claim_MN!FM27402" History

- Web Form created by Prime Clerk E-Filing (efiling@primeclerk.com)
2020-05-22 - 4:17:57 PM GMT
- Web Form filled in by Gerald Singleton (erika@slffirm.com)
2020-05-22 - 4:19:57 PM GMT- IP address: 72.192.138.39
- (User email address provided through API User-Agent: Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/81.0.4044.138 Safari/537.36)
2020-05-22 - 4:20:00 PM GMT- IP address: 72.192.138.39
- Signed document emailed to Gerald Singleton (erika@slffirm.com) and Prime Clerk E-Filing (efiling@primeclerk.com)
2020-05-22 - 4:20:00 PM GMT